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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

TREVOR CLAYTON MORGAN,

Defendant.

CASE NO. 2:24-CR-0093 DC

MODIFIED STIPULATED REQUEST TO
CONTINUE HEARING AND EXCLUDE TIME
PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 2, 2025

TIME: 9:30 a.m.

COURT: Hon. Dena M. Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 2, 2025, with a time exclusion for effective preparation of counsel.

2. The parties jointly request that the status conference be set for July 18, 2025, and request to exclude time between May 2, 2025, and July 18, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena Coggins, under Local Code T4 and 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B)(iv).

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes over 600 pages/items of discovery. Those items include: business records; investigative reports; interviews; photographs; and search warrant documents. Additionally, defense counsel

1 has reviewed some of the digital evidence in the case at the U.S. Attorney's office. The
2 investigators in this case have submitted hundreds of files to the National Center for Missing and
3 Exploited Children and recently received the results. Counsel for multiple series victims have
4 begun submitting restitution requests to the government, which will impact the judgment
5 ultimately imposed in this case.

6 b) A continuance is requested because counsel for both parties need additional time
7 for effective preparation, to address restitution issues and perform necessary research to resolve
8 the case.

9 c) Since the last requested continuance, the government has received additional
10 information regarding restitution issues and has extended a plea offer. The defendant is currently
11 detained at a facility over 200 miles from Sacramento. Counsel for defense needs sufficient time
12 discuss the plea offer with the defendant.

13 d) Since the date of the last request for a continuance, the government has also
14 produced several additional items of protected discovery, which counsel for defense must review
15 discuss with the defendant. While not voluminous, the new discovery is material and likely to
16 impact defense preparation.

17 e) Counsel for defendant believes the failure to grant a continuance in this case
18 would deny defense counsel reasonable time necessary for effective preparation, taking into
19 account the exercise of due diligence.

20 f) The government joins in the request for the continuance.

21 g) Based on the above-stated findings, the ends of justice served by continuing the
22 case as requested outweigh the interest of the public and the defendant in a trial within the
23 original date prescribed by the Speedy Trial Act.

24 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
25 et seq., within which trial must commence, the time period of May 2, 2025 to July 18, 2025,
26 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
27 because it results from a continuance granted by the Court at defendant's request on the basis of
28 the Court's finding that the ends of justice served by taking such action outweigh the best interest

1 of the public and the defendant in a speedy trial.

2 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
3 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
4 must commence.

5 IT IS SO STIPULATED.

6 Dated: April 24, 2025

7 MICHELE BECKWITH
Acting United States Attorney

8 /s/ JESSICA DELANEY
9 JESSICA DELANEY
10 Assistant United States Attorney

11 Dated: April 24, 2025

12 /s/ NOA OREN
13 NOA OREN
14 Assistant Federal Public Defender
15 Counsel for Defendant
16 TREVOR CLAYTON MORGAN

ORDER

The court has read and considered the parties' Stipulation. The court ORDERS that the status conference set for May 2, 2025 be continued to July 18, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena Coggins. The court hereby finds that the Stipulation, which the court incorporates by reference into this Order, demonstrates facts that provide a basis to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. Time is excluded under the Speedy Trial Act between May 2, 2025, and July 18, 2025.

IT IS SO ORDERED.

Dated: **April 28, 2025**


Dena Coggins
United States District Judge